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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BROOKE CARDOZA, Individually and On
Behalf of All Others Similarly Situated, et al.,

Plaintiffs,

v.

BLOOMIN' BRANDS, INC., et al.,

Defendants.

CASE NO. 2:13-cv-01820-JAD-(NJK)

**STIPULATION FOR ORDER VACATING
CASE CALENDAR AND DEADLINES**

Action Filed: October 4, 2013

WHEREAS, on October 29, 2015, the Parties attended a private mediation but were unable to reach an agreement at that time;

WHEREAS, as a result of that mediation and discussions that have followed, the Parties have reached an agreement in principle to resolve this case in its entirety through settlement;

WHEREAS, the Parties believe that judicial efficiency would best be served by allowing the parties to focus on finalizing the settlement agreement in lieu of focusing on fast-approaching discovery, briefing, and other litigation case deadlines, including the imminent filing deadlines set for November 20, 2015, the discovery hearing set for November 20, 2015, and the current December 8, 2015 discovery cut-off (ECF Nos. 330, 394, 396);

1 THEREFORE, the Parties, through their undersigned counsel of record, stipulate and agree,
2 subject to Court approval, that the discovery cut-off, decertification motion deadline and Rule 23
3 motion deadlines, and any other case deadlines and hearings currently set in this case shall be
4 VACATED. By December 17, 2015, the Parties will file a joint report advising on a date by which
5 Plaintiffs will file a motion for preliminary approval of settlement. If for some unforeseen reason the
6 Parties are unable to finalize their agreement by December 17, 2015, the Parties will file a joint report
7 with a proposed schedule to move the case forward.

8
9 Dated: November 18, 2015

Respectfully submitted,

10 GIBSON, DUNN & CRUTCHER LLP

11 By: /s/ Jesse A. Cripps
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15 Attorneys for Defendants Bloomin' Brands, Inc.;
16 OSI Restaurant Partners, LLC; Outback
Steakhouse of Florida, LLC; OS Restaurant
17 Services, LLC

18 Dated: November 18, 2015

19 WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP

20 By: /s/ Don Springmeyer
21 Don Springmeyer, Esq.
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24 *Attorneys for Plaintiffs*

25
26 **IT IS SO ORDERED.**

27 Dated: November 18, 2015.

28 **ORDER**

UNITED STATES DISTRICT COURT JUDGE